

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

-----X  
CHARLES FRAZER,

Plaintiff,

-against-

DATA DEVICE CORPORATION,

Defendant.  
-----X

Civil Action No.: 16-CV-06510  
(JFB-AYS)

DISCOVERY PLAN WORKSHEET

**Tier I Pre-Settlement Discovery**

Deadline for completion of Rule 26(a) initial disclosures  
and HIPAA-complaint records authorizations:

03/29/2018

Completion date for Phase I Discovery  
as agreed upon by the parties:

04/23/2018

*(Reciprocal and agreed upon document production,  
generally not including depositions, unless otherwise agreed.  
No more than 30 days after Initial Conference)*

Status conference TBD by the court:  
*(Generally 15 days post Tier I Discovery)*

appx: 05/08/2018

**Tier II Discovery and Motion Practice**

Motion to join new parties or amend the pleadings:  
*(Presumptively 15 days post status conference)*

05/23/2018

First requests for production of documents  
and for interrogatories due by:  
*(Presumptively 15 days post joining/amending)*

06/07/2018

All fact discovery completed by:  
*(Presumptively 3.5 months post first  
requests for documents/interrogatories)*

09/14/2018

Plaintiff's expert report completed by:  
*(Presumptively 30 days post fact discovery)*

10/15/2018

Defendant's expert report completed by:

11/14/2018

Expert depositions completed by: 12/14/2018  
(Presumptively 30 days post expert reports)

Final date to take first step in dispositive motion practice: 12/14/2018  
(Parties are directed to consult the District Judge's  
individual rules regarding such motion practice.  
Presumptively 30 days post expert depositions)

**COMPLETION OF ALL DISCOVERY BY:**  
(Note: Presumptively 9 months after Initial Conference.) [12/27]

Submission of joint pre-trial order: TBD

Final Pre-Trial Conference TBD by the court: \_\_\_\_\_